



March 12, 2004

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20061

(Via facsimile to 202.452.3819)

Re: Comments to Proposed Amendments to Regulation CC
Docket No.: R-1176

Dear Ms. Johnson:

Union Bank of California, N.A. ("UBOC" or "Bank") respectfully submits this letter in response to your request for comment on the proposed regulation to amend Regulation CC to implement the Check Clearing for the 21st Century Act (the "Check 21 Act"). We greatly appreciate being given the opportunity to provide our comments.

UBOC is the fourth-largest commercial bank headquartered in California and is among the 35 largest banks in the United States. The Bank has more than 282 branches in California, Washington and Oregon, with offices in New York and Texas, as well as 20 international locations. Our holding company is UnionBanCal Corporation. We are a full service commercial bank providing a broad mix of financial services, including trust and investment management services, private banking, and consumer and business lending with expertise in commercial, middle market, corporate and real estate lending.

UBOC serves as a member of The Electronic Check Clearing House Organization ("ECCHO") and through this association UBOC has contributed to the suggestions contained in ECCHO's response letter. Also, through its involvement with ECCHO, UBOC has worked with other financial services organizations and associations to prepare a separate joint comment letter to the Board on the Proposal, attached herewith. UBOC supports both comment letters in their entirety and the suggestions contained therein. We thank you for this opportunity to voice our support of these recommendations and appreciate your consideration of our views. Should there be any questions, or if further information is needed, please feel free to contact me at (415) 291-4780.

Sincerely,

Grisel Arias Kaplan
Senior Vice President and
Chief Compliance Officer